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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 BRYANT LECHUGA,

11 Plaintiff,

12 vs.

13 RAMPARTS, LLC, a Nevada Limited Liability
Company; DOES I-X; and ROE Business
14 Entities I-X,

15 Defendants.

Case No. 2:19-cv-01731-APG-BNW

**STIPULATION AND ORDER TO STAY
ACTION UNTIL MAY 22, 2020**

(ECF No. 24)

16 IT IS HEREBY STIPULATED by and between Plaintiff Bryan Lechuga (“Plaintiff”),
17 through his counsel Kemp & Kemp, and Defendant Ramparts, LLC (“Defendant”), through its
18 counsel Jackson Lewis P.C., that this action be stayed in its entirety for 60 days, until May 22,
19 2020, with this Court’s approval. This Stipulation is submitted and based upon the following:

20 1. Due to the public health and safety issues caused by COVID-19, the Parties
21 anticipate significant delays in the discovery process. Defendant has temporarily ceased all
22 business operations for health and safety reasons, and will continue to do so in accordance with the
23 directive of Governor Steve Sisolak. During this time, the Parties will be unable to participate
24 meaningfully in discovery.

25 2. Due to these circumstances, the Parties agree it is appropriate that this matter be
26 stayed in its entirety for a period of 60 days, until May 22, 2020.

3. On or before May 29, 2020, the Parties will submit a Stipulation and Order to Amend the Scheduling Order (ECF No. 21) to establish new deadlines.

4. Should circumstances change such that a shorter or a longer stay is appropriate, the Parties will immediately and jointly notify the Court.

5. This request is made in good faith and not for the purpose of delay.

Dated this 23rd day of March, 2020.

KEMP & KEMP

JACKSON LEWIS P.C.

/s/ James P. Kemp

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*Attorneys for Defendant
Ramparts, LLC*

ORDER

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: May 5, 2020.

4824-7170-8088, v. 1